

Letter to the FCC about Workshops. from FCC: - Thanks for your message. Let me reiterate that we welcome any comments or information that you could provide to us. I presume - that you are familiar with the process for filing comments in FCC proceedings. If not, they are described at <http://www.fcc.gov/osec/>. Thank you for your email. I understand that the FCC is busy, but we would appreciate it if the FCC actually read the materials we created prior to making decisions about having us not present at the workshop. Since 1998 we filed over 35 different comments, complaints, etc. We have no faith that filing any comments will yield any results. In fact, when the FCC has gotten back to us, only because of a legal obligation, their response has been --- if you don't like our answer, take us to court. However, with the hope that this Administration would really be for change, we have been filing related to the FCC's current broadband initiative: We already filed comments with the FCC pertaining to broadband. (GN Docket No. 09-51). In fact, we entered two ebooks, at our own expense, into testimony to give the FCC sufficient data --- That comes to 872 total pages and 1292 footnotes. (Counting the filed comments, that brings the total to over 950 pages, about 2.3% of all of the 41,000 pages filed.), Filed June 8th, 2009. <http://www.newnetworks.com/broadbandcommentsrelease.htm> We already filed a request to have a separate workshop dedicated to the customer-funding of broadband and the issues surrounding the transference of utility assets to non-regulated interstate information services, --- No response, August 12th, 2009 <http://www.newnetworks.com/fccbroadbandworkshops.htm> And let me be clear, this is well documented. For example, the New York State Department of Public Service has granted Verizon over 90% increases in the cost of local service since 2004, (based on actual phone bills) and in June 2009, specifically claimed the money was for Verizon's fiber optic deployment which is FiOS. We are always concerned about the impacts on ratepayers of any rate increase, especially in times of economic stress, said Commission Chairman Garry Brown. Nevertheless, there are certain increases in Verizon's costs that have to be recognized. This is especially important given the magnitude of the company's capital investment program, including its massive deployment of fiber optics in New York. We encourage Verizon to make appropriate investments in New York, and these minor rate increases will allow those investments to continue. The quote doesn't include the fact that almost all services, including Call Waiting or inside wiring, were also increased, nor does it mention that those who may never use FiOS, from the rural areas not served (and no plans to be wired according to Verizon) or those who rely on local service but are not users of broadband, including Seniors, are now funding an interstate information service and cable build-out through rate increases, which is illegal in most states. And, as documented, Verizon and AT and T have collected billions per state since state laws were changed to fund upgrades of the PSTN Public Switched Telephone networks. Ironically, on Sept. 29th, 2009, the FCC's broadband status report claimed expanding broadband could cost up to \$ 350 billion, yet not once in any workshop did anyone discuss that we are already paying for the upgrades of the networks for broadband or that those who are being charged may never see the product in their lifetime, much less want it. We already filed a pertaining to small business competition and the FCC's failure to follow the basic tenets of the Regulatory Flexibility Act and Data Quality Act, which helped to close down broadband competition

from independent ISPs and CLECs, and other competitors. (DA 09-1307, CB No. 09- 102 and other dockets.) We documented that in hundreds of rulemakings, the FCC competition analysis (IRFA) uses data from 1992, 1993 and 1997 for current markets. We also outline how AT and T and Verizon bid as very small businesses and got \$ 8 billion in small business discounted spectrum. harming broadband competition. September 8th, 2009, <http://www.newnetworks.com/TeletruthRFA.htm> In fact, weve been filing about broadband since 1998. Go to: http://fjallfoss.fcc.gov/prod/ecfs/comsrch_v2.cgi to read our comments by typing in New Networks Institute or Teletruth. No wonder Blair Levin, FCC broadband architect can say he is not impressed with the FCC's submissions from the public and industry on the grand broadband plan, suggesting there was too much pie in the sky and not enough pie chart on the page. He said the comments lacked helpful data, analysis of tradeoffs and seriousness of purpose. http://www.broadcastingcable.com/article/315891-Levin_Broadband_Comments_Don_t_Move_Ball_Forward.php If you dont read the comments. Bruce Kushnick Executive Director, New Networks Institute Chairman, Teletruth <http://www.newnetworks.com>